

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

UNITED STATES OF AMERICA,)	INDICTMENT
)	
Plaintiff,)	18 U.S.C. § 922(g)(1)
)	18 U.S.C. § 924(d)(1)
v.)	18 U.S.C. § 924(e)
)	28 U.S.C. § 2461(c)
RAYJON MATTHEW WILLIS,)	
)	
Defendant.)	

THE UNITED STATES GRAND JURY CHARGES THAT:

COUNT 1

(Felon in Possession of a Firearm—Armed Career Criminal)

On or about July 6, 2022, in the State and District of Minnesota, the defendant,

RAYJON MATTHEW WILLIS,

having been previously convicted of the following crimes, each of which was punishable by imprisonment for a term exceeding one year, and at least three of which were violent felonies committed on occasions different from one another:

Offense	Place of Conviction	Date of Conviction (On or About)
Assault 3rd Degree – Substantial Bodily Harm	St. Louis County, MN	October 9, 2012
Assault 2nd Degree – Dangerous Weapon	Hennepin County, MN	July 10, 2014



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Offense	Place of Conviction	Date of Conviction (On or About)
Drugs 5th Degree	Hennepin County, MN	July 19, 2016
Domestic Assault - Strangulation	St. Louis County, MN	March 9, 2020
Violate No Contact Order	Itasca County, MN	December 30, 2020

and knowing he had been convicted of at least one crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting interstate and foreign commerce, a firearm, namely, a Ruger model LCP .380 caliber semiautomatic pistol bearing serial number 372418731; all in violation of Title 18, United States Code, Sections 922(g)(1) and 924(e).

FORFEITURE ALLEGATIONS

Count 1 of this Indictment is hereby realleged and incorporated as if fully set forth herein by reference, for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 924(d)(1), in conjunction with Title 28, United States Code, Section 2461(c).

As a result of the forgoing offense, the defendant shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1), any firearm or ammunition involved in or used in any knowing violation of Sections 922(g) and 924(e)(1), including a firearm, namely the Ruger model LCP .380 caliber semiautomatic pistol bearing serial number 372418731 charged in Count 1 of the Indictment, together with ammunition, all in violation of Title

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18, United States Code, Sections 922(g)(1), 924(e)(1), and 924(d)(1), in conjunction with Title 28, United States Code, Section 2461(c).

A TRUE BILL

UNITED STATES ATTORNEY

FOREPERSON